Linda:

During our June 13, 2013 phone call we briefly discussed some ideas MPCA has related to revising Minnesota's water quality standards for Class 3 (Industrial) and Class 4 (Irrigation and Wildlife) uses. During the call you mentioned that talking points may help facilitate conversations within EPA Region 5 and with headquarters on this topic. To that end we have developed the following talking points on the potential revisions.

Class 3 – Industrial

- Class 3 (Industrial Use) is currently in the scope of the ongoing triennial review.
- Class 3 numeric standards:

Subclass	Chlorides	Hardness, Ca + Mg as CaCO3	pH
Class 3A	50 mg/L	50 mg/L	6.5 – 8.5
Class 3B	100 mg/L	250 mg/L	6.0 – 9.0
Class 3C	250 mg/L	500 mg/L	6.0 – 9.0
Class 3D	Maintain background (MB)	(MB)	(MB)

- MPCA commissioned the University of Minnesota to evaluate the industrial water use classification. The results overwhelmingly showed that industrial users in Minnesota are pretreating the water prior to its use. In surveying industrial users no interest was expressed in specific water quality conditions for industrial use protection.
- MPCA is proposing to retain the industrial use classification but change it from a set of numeric standards to a general narrative standard to protect for industrial uses.
- One possibility is something to the effect of "water is suitable for industrial consumption following appropriate pretreatment…MPCA may require numeric restrictions in/controls on permits/regulated activated to protect industrial uses if appropriate pretreatment is not available."
- MPCA would like to propose these changes in a formal rulemaking effort in the near future.

Class 4A – Irrigation

- Class 4A is not currently in the scope of the ongoing triennial review.
- The MPCA is currently conducting research related to wild rice and sulfate which may result in a change to the 10 mg/L sulfate standard for wild rice production waters. If necessary, rulemaking to revise the wild rice standard would start in early 2014.
- The current Class 4A irrigation standards include numeric standards for bicarbonates, boron, pH, specific conductance, total dissolved salts, sodium, sulfates, and radioactive materials. Several rulemaking amendments being considered for the Class 4A water use classification include: 1) adoption of one or two numeric standards that would serve as surrogate replacements for many of the "salty related standards" contained under the Class 4A and 4B use classes (e.g. conductivity, xxx); 2) only apply the Class 4A irrigation standards to surface waters of the state when the use is known to exist and is documented in existing Minnesota Department of Natural Resources water appropriate permits for irrigation; 3) generally apply the Class 4A standards on a seasonal basis (with explicit months defined) to coincide with the crop growing season in Minnesota; This approach may pose some uncertainty for potential dischargers who may be subject to new limits if a new irrigation use is designated.
- MPCA would like to propose these changes in the near future.

Protecting Aquatic Uses

The MPCA is committed to protecting aquatic life uses as well as other protected uses.
There are no aquatic life criteria currently available for the Class 3 and 4 parameters.
The MPCA is interested in reviewing all available aquatic life numeric criteria available for the Class 3 and 4 parameters.
The MPCA is committed to considering and adopting aquatic life water quality standards for salty parameters if it is found necessary to protect those uses.